

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

GREGORIO TREVINO, JR., et al. )  
Plaintiffs, )  
v. ) Civil Case No. 15-CV-435  
HIDALGO COUNTY, TEXAS, et al., )  
Defendants. )

## **PLAINTIFFS' PROPOSED JURY INTERROGATORIES**

The Jury Must Unanimously Agree on the Answers to All of The Questions.

Do you find from a preponderance of the evidence:

1. That Rene Martinez Herrera's reassignment to the road patch crew was objectively worse compared to his previous duties working at Delta Lake Park?

**YES**                            **NO**

2. That Rene Martinez Herrera's First Amendment protected speech and association was a motivating factor in Defendants' decision to reassign him to the road patch crew?

**YES**                    **NO**

If you answered Yes to Question 1 and 2, answer Question 3. If you answered “No” to questions 1 and 2, do not answer Question 3.

3. By a preponderance of the evidence, what sum of money, if any, would fairly and reasonably compensate Rene Martinez Herrera for his damages caused by Defendants' violations of law?

Answer in dollars and cents, if any.

- a. Emotional pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life.

Answer: \_\_\_\_\_

b. Punitive damages

Answer: \_\_\_\_\_

Do you find by a preponderance of the evidence:

4. That J.C. Cardenas's reassignment to the road patch crew was objectively worse compared to his previous duties?

YES \_\_\_\_\_ NO \_\_\_\_\_

5. That J.C. Cardenas's First Amendment protected speech and association was a motivating factor in Defendants' decision to reassign him to the road patch crew?

YES \_\_\_\_\_ NO \_\_\_\_\_

If you answered Yes to Question 4 and 5, answer Question 6. If you answered "No" to questions 4 and 5, do not answer Question 6.

6. By a preponderance of the evidence, what sum of money, if any, would fairly and reasonably compensate J.C. Cardenas for his damages caused by Defendants' violations of law?

Answer in dollars and cents, if any.

a. Emotional pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life.

Answer: \_\_\_\_\_

b. Punitive damages

Answer: \_\_\_\_\_

Do you find by a preponderance of the evidence:

7. That Santiago Zavala's First Amendment protected speech and/or association was a motivating factor in Defendants' decision to terminate his employment?

YES \_\_\_\_\_ NO \_\_\_\_\_

If you answered “Yes” to question 7, answer question 8. If you answered “No” to question 7, do not answer question 8.

8. By a preponderance of the evidence, what sum of money, if any, would fairly and reasonably compensate Santiago Zavala for his damages caused by Defendants’ violations of law?

Answer in dollars and cents, if any.

- a. Earnings, including benefits, that Santiago Zavala has lost in the past.

Answer: \_\_\_\_\_

- b. Emotional pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life.

Answer: \_\_\_\_\_

- c. Punitive damages

Answer: \_\_\_\_\_

- d. Earnings, including benefits, that Plaintiff Santiago Zavala is reasonably certain to lose in the future.

Answer: \_\_\_\_\_

The foreperson should sign and date the Form of Verdict.

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FOREPERSON

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DATE